

ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

In re Matter of)

Amendment of Section 73.202(b))
 of the Commission's Rules)
 Table of Allotments)
 FM Broadcast Stations)
 (Herrin, IL and Ironton, MO))

RM - _____

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

to: Chief, Allocations Branch
 Policy and Rules Division
 Mass Media Bureau

PETITION FOR RULEMAKING

Wayne E. Tate, the permittee of WVZA, Herrin, Illinois, by his attorneys, hereby petitions for an amendment to the FM Table of Allotments. Specifically, Mr. Tate requests that the following changes be made:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Herrin, Illinois	224A	224B1
Ironton, Missouri	224A	258A

In addition to the changes referenced above, Mr. Tate respectfully requests that the Commission modify the construction permit for WVZA to specify operations on the new class B1 channel.

As set forth in the attached Engineering Exhibit of Dybedock and Associates, Inc., these proposals meet all FCC spacing requirements and otherwise comply with Commission rules. Therefore, this proposal can be adopted. Mr. Tate recognizes his obligations to the licensee of KYLS at Ironton pursuant to

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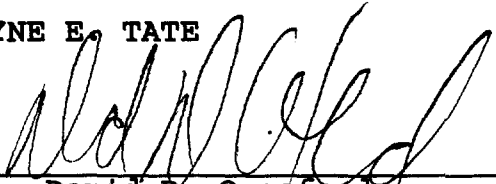
Circleville, Ohio, 8 FCC 2d 159 (1967), and commits to honor those obligations.

Mr. Tate will promptly file an application for the upgraded facilities upon approval of this change in the Table of Allotments. Upon grant of that application, he commits to construct the ungraded facilities. Therefore, the requested changes in the FM Table Allotments should be made.

Respectfully submitted,

WAYNE E. TATE

By


David D. Oxenford,
His Attorney

Fisher, Wayland, Cooper
and Leader
1255 23rd Street, N.W.
Suite 800
Washington, D.C. 20037
(202) 659-3494

Dated: August 19, 1993

9797-000

DYBEDOCK and Associates, Inc.

1455 Budd Blvd. / Kankakee, Illinois 60901
(815) 937-1722 / FAX (815) 937-1844

PROPOSAL FOR RULEMAKING

AMENDMENT OF SECTION 73.202(B)

**CHANGE THE ALLOTTED CLASS AT HERRIN, ILLINOIS
CHANGE ALLOTMENT AT IRONTON, MISSOURI.**

ON BEHALF OF WAYNE E. TATE

ENGINEERING STATEMENT

This Engineering Study and attached Exhibits have been prepared on behalf of Wayne E. Tate and are in support of a Petition for Rulemaking to Amend the FM Table of Allotments 73.202(b).

Wayne E. Tate is presently the Transferee of a Construction Permit BPH-890405ME to construct a station at Herrin, Illinois on channel 224A, for which call letters WVZA have been assigned. Wayne E. Tate recently filed an application to move the station to the site of an existing tower in order to be able to commence construction of the station immediately upon grant of the application.

Dybedock and Associates, Inc. has been retained to determine whether WVZA can upgrade to a higher class in order to increase its power and serve a greater number of people. A study determined that a site is available in which WVZA can

upgrade to a Class B1 operating on Channel 224 except that KYLS on channel 224A in Ironton, Missouri would be short spaced. KYLS operates with 0.64 kilowatts at a height of 204 meters above average terrain. This is approximately equivalent to 3 kilowatts at 100 meters A.A.T.

A further study was conducted which determined that an alternate channel exists which would permit full 6 kilowatts operation at KYLS and would remove the short space to WVZA, permitting an upgrade of the Herrin, Illinois allotment to Class B1. The upgrade at Herrin will increase the area covered by approximately 95 percent and will result in a 36 percent increase in population served from 129,257 to 176,133, and will clearly be in the public interest.

PROPOSAL

It has been found that by substituting Channel 258A for Channel 224A at Ironton, Missouri, the Allotment to the community of Herrin, Illinois can be changed from 224A to Channel 224B1, while complying with all of the Commission's spacing requirements under 73.207.

PROPOSED ALLOTMENTS

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Ironton, Missouri (KYLS)	224A	258A
Herrin, Illinois (WVZA)	224A	224B1

This Proposal also offers the advantage of a fully spaced Allotment at Ironton under 73.207. which will permit operation of KYLS at 6.0 kW. ERP or its equivalent at the higher antenna height above average terrain. KYLS will be able to double its power. It is respectfully submitted that a 6.0 kW. facility would better serve the public than would a 3.0 kW. station.

Two single channel spacing studies are attached which demonstrate the usability of the proposed channel at each location:

EXHIBIT 1. shows the substitution of Channel 258A in place of 224A at Ironton, Missouri, using the site coordinates of the present operation of KYLS. The substitution permits operation by KYLS at 6.0 kW. or equivalent in full compliance with the FM Spacing Rules.

EXHIBIT 2. shows the substitution of Channel 224B1 in place of 224A at Herrin, Illinois. A site restriction will be required which is approximately 20 kilometers west of the community of Herrin. Sample site coordinates of 37° 45' 00'' North, 89° 14' 45'' West were used.

In each case, the respective facilities will place the city grade contours over the entire community of license. In the case of Herrin, a substantial area in the vicinity of the site restriction coordinates will be available for the construction of the station.

Upon grant of this Proposal, Wayne E. Tate will promptly file an application to increase the facility at WVZA to a maximum facility Class B1, and will immediately construct the station when the construction permit is granted.

AFFIDAVIT

COUNTY OF KANKAKEE)
)
STATE OF ILLINOIS) SS:

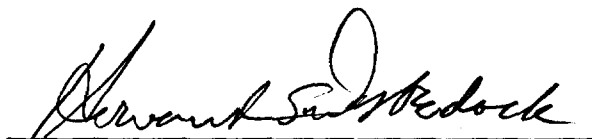
Howard S. Dybedock, being duly sworn upon oath deposes and says:

That he is the President of Dybedock and Associates, Inc., and is a qualified broadcast technical consultant;

That his qualifications are a matter of record with the Federal Communications Commission;

That his firm has been retained by Wayne E. Tate to prepare this engineering exhibit;

That he has either prepared or directly supervised the preparation of all technical information contained in this engineering exhibit, and that all the facts stated herein are true of his knowledge except as to such statements as are stated to be based on information and belief and as to such statements he believes them to be true.



Howard S. Dybedock, President

Subscribed and sworn to before me this 9th. day of
August, 1993.



Notary Public

(SEAL)

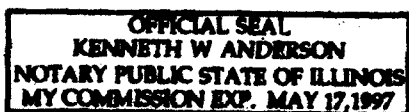


EXHIBIT 1.
WAYNE E. TATE

Dybedock and Associates, Inc.
Kankakee, Illinois
August 2, 1993

FM SPACING STUDY

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for any errors or omissions in the information hereby provided,
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consequential) which may result from use of the said information.

Job title: KYLS Class A
Channel: 258A
Coordinates: 37-34-23 90-41-35
Safety Zone: 30 km.

FM Spacing study

Title: KYLS A.STY
Channel 258A (99.5 MHz)
Database: DW 07/17/93

Latitude: 37-34-23
Longitude: 90-41-35
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WSIE	LIC	SOUTHERN ILLINOIS UNIVER	*204B	50DA	38-47-06	24.4	148.1	15
EDWARDSVILLE	IL	BLED-860115KB	88.7	152	89-59-10	204.9	133.1	CLEAR
KJLU	LIC	LINCOLN UNIVERSITY OF MI	*205C2	40	38-27-29	306.7	166.6	15
JEFFERSON CITY	MO	BLED-810107AC	88.9	155	92-13-32	125.8	151.6	CLEAR
Was KLUM-FM 08/07/92 per FCC release #188 dated 07/31/92								
KFLD	CP	NEIL A RONES & LUANN C D	255A	6	37-52-41	320.0	44.35	31
SAINT ROBERT	MO	BPH-890706MD	98.9	100	91-01-05	139.8	13.35	CLOSE
CP Granted 05/31/91 per FCC release #21129 dated 06/06/91; Call Granted 06/28/91 per FCC release #161 dated 06/28/91								
KFUO-FM	LIC	LUTHERAN CHURCH - MO SYN	256C	100	38-34-24	16.0	115.6	95
CLAYTON	MO	BLH-881115KB	99.1	313	90-19-30	196.3	20.63	CLEAR
License Granted 06/12/90 per FCC release #20888 dated 06/21/90; Affiliated with h KFUE(AM)								
KCGQ	LIC	TARGET MEDIA INCORPORATE	257A	4.20	37-22-07	102.8	99.94	72
GORDONVILLE	MO	BLH-900629KB	99.3	118	89-35-34	283.5	27.94	CLEAR
License Granted 03/11/91 per FCC release #21074 dated 03/19/91; Was KTXI 04/09/92 per FCC release #180 dated 04/10/92								
KUNQ	CP	TEXAS COUNTY RADIO INCOR	257C2	26	37-04-55	245.8	131.4	106
HOUSTON	MO	BPH-911209IE	99.3	207	92-02-31	65.0	25.39	CLEAR
CP Granted 04/24/92 per FCC release #21369 dated 05/01/92; ORDERED FROM 257A; Affiliated with KBTC(AM)								
KADI	LIC	SNOWMEN BROADCASTING INC	258A	6	37-09-54	260.1	243.6	115
REPUBLIC	MO	BLH-900626KB	99.5	100	93-23-44	78.4	128.6	CLEAR
License Granted 06/13/91 per FCC release #21141 dated 06/20/91; Call Granted 1/13/89								
KZYQ	CP	JOHN E. HOEHN	259C3	25	38-04-14	303.2	101.8	89
SAINT JAMES	MO	BMPH-930127IC	99.7	100	91-39-53	122.7	12.82	CLOSE
CP Granted 05/11/93 per FCC release #21640 dated 05/20/93; Call Granted 09/27/88								
KFAV	CP	KASPAR BCG CO OF MISSOUR	260C3	6	38-50-20	347.8	143.8	42
WARRENTON	MO	BMPH-911017IF	99.9	156	91-02-40	167.6	101.8	CLEAR
CP Granted 02/24/92 per FCC release #21324 dated 02/28/92; Call Granted 04/30/90 per FCC release #131 dated 04/06/90; Ant: Elec. Res. Inc. G5CPM-6C								
KDJR	LIC	JEFFERSON COMMUNICATIONS	261A	2	38-01-25	12.4	51.22	31
DE SOTO	MO	BLH-910131KB	100.1	122	90-34-02	192.5	20.22	CLEAR
License Granted 10/30/91 per FCC release #21243 dated 11/05/91; Was KOLS 02/19/90 per FCC release #128 dated 02/23/90; Ant: Jampro JSCP-3								

>> End of channel 258A study <<

FM Spacing study

Title: KYLS A.STY
Channel 258A (99.5 MHz)
Database: FCC 06/29/93

Latitude: 37-34-23
Longitude: 90-41-35
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WSIE	LIC	Board of Trustees Southe	*204B	50DA	38-47-06	24.4	148.1	15
Edwardsville	IL		88.7	152	89-59-10	204.9	133.1	CLEAR
DA: oddball ODD860115KB @ 0 deg								
KJLU	LIC	Lincoln University of Mi	*205C2	40	38-27-29	306.7	166.6	15
Jefferson City	MO		88.9	155	92-13-32	125.8	151.6	CLEAR
KFLD	CP	Neil A. Rones and Luann	255A	6	37-52-41	286.6	121.6	31
St. Robert	MO	BPH-890706MD	98.9	100	92-01-05	105.8	90.62	CLEAR
KFUO-FM	LIC	The Lutheran Church-Miss	256C	100	38-34-24	16.0	115.6	95
Clayton	MO	BLH-881115KB	99.1	313	90-19-30	196.3	20.63	CLEAR
ALLOC			256C		38-34-24	16.0	115.6	95
Clayton	MO		99.1		90-19-30	196.3	20.63	CLEAR
Coordinates updated from LIC record BLH881115KB								
ALLOC			257A		37-12-47	113.8	98.16	72
Gordonville	MO		99.3		89-40-50	294.4	26.16	CLEAR
Coordinates updated from LIC record BLH781206AG								
KCGQ	LIC	Target Media, Incorporat	257A	4.20	37-22-07	102.8	99.94	72
Gordonville	MO	BLH-900629KB	99.3	118	89-35-34	283.5	27.94	CLEAR
ALLOC			257C2		37-06-15	243.2	114.3	106
Houston	MO	DOC-90-619	99.3		91-50-30	62.5	8.319	CLOSE
Effective 9-9-91-Reserved for KUNQ per D90-619								
KUNQ	CP	Broadcasters of Texas Co	257C2	30	37-04-55	245.8	131.4	106
Houston	MO	BPH-911209IE	99.3	192	92-02-31	65.0	25.39	CLEAR
From channel 257A per D90-619								
KADI	LIC	Snowmen Broadcasting, In	258A	6	37-09-54	260.1	243.6	115
Republic	MO	BLH-900626KB	99.5	100	93-23-44	78.4	128.6	CLEAR
ALLOC			259C3		38-04-38	304.4	100.0	89
St. James	MO	DOC-89-588	99.7		91-38-06	123.8	11.05	CLOSE
Effective 10-29-90-Rsvd for KZYQ per D89-588								
KZYQ-FM	CP	John E. Hoehn	259C3	25	38-04-14	303.2	101.8	89
St. James	MO	BMPH-930127IC	99.7	100	91-39-53	122.7	12.82	CLOSE
KFAV	CP	Kaspar Broadcasting Comp	260C3	6	38-50-20	347.8	143.8	42
Warrenton	MO	BMPH-911017IF	99.9	156	91-02-40	167.6	101.8	CLEAR
From channel 260A per D91-44								

FM Spacing study

Title: KYLS A.STY
Channel 258A (99.5 MHz)

Latitude: 37-34-23
Longitude: 90-41-35

Call	Auth Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KDJR	LIC Jefferson Communications	261A	2	38-01-25	12.4	51.22	31
De Soto	MO BLH-910131KB	100.1	122	90-34-02	192.5	20.22	CLEAR
ALLOC		261A		38-01-25	12.4	51.22	31
De Soto	MO	100.1		90-34-02	192.5	20.22	CLEAR
Coordinates updated from CP record		BPH850710NC					

>> End of channel 258A study <<

EXHIBIT 2.
WAYNE E. TATE

Dybedock and Associates, Inc.
Kankakee, Illinois
August 9, 1993

FM SPACING STUDY

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Job title: WVZA Class B1
Channel: 224B1
Coordinates: 37-45-00 89-14-45
Safety Zone: 30 km.

DYBEDOCK & ASSOCIATES INC
1455 Budd Blvd./ Kankakee IL 60901

WVZA HERRIN ILLINOIS
B1 UPGRADE

REFERENCE		CLASS B1	DISPLAY DATES
37 45 00 N			DATA 03-31-93
89 14 45 W		Current rules spacings	SEARCH 08-08-93
----- CHANNEL 224 - 92.7 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WVZA.C	224A	Herrin	IL	46.9	12.94	143.0	-130.06 *
CP CN	37 49 47	89 08 19	6.000 kW	99M	8.0	88.9	
	Herrin Broadcasting, Inc.				BPH890405ME		
WRAJFM	224A	Anna	IL	180.6	33.76	143.0	-109.24 *
LI HN	37 26 45	89 15 00	3.000 kW	88M	21.0	88.9	
	Union Broadcasting, Inc.				BLH2860		
>*To Channel 243C2 per D87-599							
KYLS	224A	Ironton	MO	261.3	129.20	143.0	-13.80 *
LI CN	37 34 23	90 41 35	0.640 kW	204M	80.3	88.9	
	Mid-America Communications, I				BLH840113AK		
WBKR	223C	Owensboro	KY	94.7	193.98	193.0	0.98 <
LI CY	37 36 29	87 03 15	100.000 kW	320M	120.6	119.9	
	Owensboro Broadcasting Compan				BLH870121KD		
WSEI	225B	Olney	IL	44.1	146.75	145.0	1.75 <
LI CN	38 42 00	88 04 49	50.000 kW	88M	91.2	90.1	
	V.L.N. Broadcasting, Inc.				BMLH820720AD		
KMAL	224A	Malden	MO	206.1	148.00	143.0	5.00
LI CN	36 33 08	89 58 42	3.000 kW	55M	92.0	88.9	
	Tri-County Broadcasting Co.,				BLH791105AC		
KBDZ	226A	Perryville	MO	259.6	62.17	48.0	14.17
LI CN	37 38 56	89 56 21	1.600 kW	190M	38.6	29.8	
	Donze Communications, Inc.				BLH910131KC		
DE226	226A	Perryville	MO	260.9	62.64	48.0	14.64
DE	37 39 39	89 56 50	0.000 kW	0M	38.9	29.8	
	O. L. Turner						
WKYQ.C	227C1	Paducah	KY	144.3	95.81	77.0	18.81
CP CN	37 02 56	88 36 52	100.000 kW	279M	59.5	47.9	
	Bristol Broadcasting Company,				BPH901029IE		
WUEZ	278A	Christopher	IL	51.5	32.41	12.0	20.41
LI CN	37 55 55	88 57 28	6.000 kW	100M	20.1	7.5	
	Brandt Broadcasting, Inc.				BLH910206KD		

DYBEDOCK & ASSOCIATES INC
1455 Budd Blvd./ Kankakee IL 60901

CLASS B1

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WKYQ	227C1	Paducah	KY	145.5	99.01	77.0	22.01
LI CN	37 00 53	88 36 46	89.000 kW	110M	61.5	47.9	
	Bristol Broadcasting Company,				BLH810701AQ		
WILFM	222C	St. Louis	MO	308.8	129.68	105.0	24.68
LI CY	38 28 56	90 23 53	100.000 kW	300M	80.6	65.3	
	Heritage Media Corp.				BLH890707KC		
WTJY.C	224B1	Taylorville	IL	353.7	211.53	175.0	36.53
CP CN	39 38 38	89 30 51	11.500 kW	147M	131.5	108.8	
	USA Radio Partnership				BPH920929IC		
>From Channel 224A Per D90-510							

FM Spacing study

Title: WVZA HERRIN IL
Channel 224B1 (92.7 MHz)
Database: FCC 06/29/93

Latitude: 37-45-00
Longitude: 89-14-45
Safety zone: 45 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
ALLOC			221A		38-43-18	53.2	182.8	48
Vincennes	IN		92.1		87-33-37	234.2	134.8	CLEAR
Coordinates updated from LIC record			BLH881007KB					
ALLOC			222C		38-28-56	309.3	129.7	105
St. Louis	MO		92.3		90-23-53	128.6	24.67	CLEAR
Coordinates updated from LIC record			BLH890707KC					
WIL-FM LIC		Heritage Media Corp.	222C	100	38-28-56	309.3	129.7	105
St. Louis	MO	BLH-890707KC	92.3	300BT	90-23-53	128.6	24.67	CLEAR
ALLOC			223C		37-36-29	94.0	194.0	193
Owensboro	KY		92.5		87-03-15	275.3	.981	CLOSE
Coordinates updated from LIC record			BLH870121KD					
WBKR LIC		Owensboro Broadcasting C	223C	100	37-36-29	94.0	194.0	193
Owensboro	KY	BLH-870121KD	92.5	320BT	87-03-15	275.3	.981	CLOSE
WVZA CP		Herrin Broadcasting, Inc	224A	6	37-49-47	46.7	12.94	143
Herrin	IL	BPH-890405ME	92.7	99	89-08-19	226.8	-130	SHORT
DOC-90-370								
ALLOC			224A		37-49-47	46.7	12.94	143
Herrin	IL	DOC-87-599	92.7		89-08-19	226.8	-130	SHORT
Filing window 03/06-04/05/89 **CLOSED** ; Effective			3-3-89					
WRAJ-FM LIC		Union Broadcasting, Inc.	224A	3	37-26-45	180.6	33.76	143
Anna	IL	BLH-2860	92.7	88	89-15-00	.6	-109	SHORT
*To Channel 243C2 per D87-599								
ALLOC			224A		37-34-23	261.7	129.2	143
Ironton	MO		92.7		90-41-35	80.8	-13.8	SHORT
Coordinates updated from LIC record			BLH840113AK					
KYLS LIC		Mid-America Communicatio	224A	.64	37-34-23	261.7	129.2	143
Ironton	MO	BLH-840113AK	92.7	204	90-41-35	80.8	-13.8	SHORT
ALLOC			224A		36-33-08	206.2	148.0	143
Malden	MO		92.7		89-58-42	25.8	5.002	CLOSE
Coordinates updated from LIC record			BLH791105AC					
KMAL LIC		Tri-County Broadcasting	224A	3	36-33-08	206.2	148.0	143
Malden	MO	BLH-791105AC	92.7	55	89-58-42	25.8	5.002	CLOSE
ALLOC			224B1		39-32-00	355.0	198.8	175
Taylorville	IL	DOC-90-510	92.7		89-27-00	174.8	23.76	CLEAR
Site Restricted-Effective 5-8-92-Reserved for WTJY Per D90-510								

FM Spacing study

Title: WVZA HERRIN IL
Channel 224B1 (92.7 MHz)

Latitude: 37-45-00
Longitude: 89-14-45

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WQLZ	CP	USA Radio Partnership	224B1	11.5	39-38-38	353.8	211.5	175
Taylorville	IL	BPH-920929IC	92.7	147	89-30-51	173.6	36.53	CLEAR
From Channel 224A Per D90-510								
WSEI	LIC	V.L.N. Broadcasting, Inc	225B	50	38-42-00	43.6	146.8	145
Olney	IL	BMLH-820720AD	92.9	88	88-04-49	224.3	1.751	CLOSE
ALLOC			225B		38-42-00	43.6	146.8	145
Olney	IL		92.9		88-04-49	224.3	1.751	CLOSE
Coordinates updated from LIC record BMLH820720AD								
KBDZ	LIC	Donze Communications, In	226A	1.60	37-38-56	259.8	62.17	48
Perryville	MO	BLH-910131KC	93.1	190	89-56-21	79.3	14.17	CLOSE
ALLOC			226A		37-39-39	261.1	62.61	48
Perryville	MO	DOC-87-224	93.1		89-56-49	80.7	14.61	CLOSE
PRM	DEL	O. L. Turner	226A		37-39-39	261.1	62.64	48
Perryville	MO		93.1		89-56-50	80.7	14.64	CLOSE
WKYQ	CP	Bristol Broadcasting Com	227C1	100	37-02-56	144.2	95.81	77
Paducah	KY	BPH-901029IE	93.3	279	88-36-52	324.6	18.81	CLEAR
ALLOC			227C1		37-00-53	145.4	99.01	77
Paducah	KY		93.3		88-36-46	325.8	22.01	CLEAR
Coordinates updated from LIC record BLH810701AQ								
WKYQ	LIC	Bristol Broadcasting Com	227C1	89	37-00-53	145.4	99.01	77
Paducah	KY	BLH-810701AQ	93.3	110	88-36-46	325.8	22.01	CLEAR
ALLOC			277C1		38-31-47	313.6	126.6	24
St. Louis	MO		103.3		90-17-58	132.9	102.6	CLEAR
Coordinates updated from LIC record BLH6439								
ALLOC			278A		37-55-55	51.3	32.41	12
Christopher	IL	DOC-87-599	103.5		88-57-28	231.4	20.41	CLEAR
Filing window 03/06-04/05/89 **CLOSED** ; Site Restricted-Effective 3-3-89								
WUEZ	LIC	Brandt Broadcasting, Inc	278A	6	37-55-55	51.3	32.41	12
Christopher	IL	BLH-910206KD	103.5	100	88-57-28	231.4	20.41	CLEAR

>> End of channel 224B1 study <<

CERTIFICATE OF SERVICE

I, Leslie Anne Byers, hereby certify that I have this 19th day of August, 1993, mailed by first class United States mail, postage prepaid, copies of the foregoing "Petition for Rulemaking" to the following:

*Michael C. Ruger
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 8318
Washington, DC 20554

David E. Smith
President
David E. Smith Communications, Inc.
KFTW/KYLS Radio
P. O. Box 71
Fredericktown, Missouri 63645


Leslie Anne Byers

*Hand Delivered